

Schary, Claire

From: Carrie Sanneman <sanneman@willamettepartnership.org>
Sent: Wednesday, July 30, 2014 9:10 AM
To: ADES Dennis R; FOSTER Eugene P; hbre461@ECY.WA.GOV; Marti Bridges; mgil461@ECY.WA.GOV; Michael McIntyre; Ranei Nomura; Schary, Claire
Cc: Bobby Cochran; Joe Furia; Karin Power; Neil Mullane; Tim Wigington
Subject: PLEASE REVIEW: New revisions to Joint Recommendations
Attachments: Recommendations on WQT_ThirdDraft_2014 07 29.docx

Hi all,

A few more revisions for you to review. About half are grammatical, the others are rephrasings to avoid specific unintended implications. Please let us know as soon as possible if you are OK with these changes so we can either revise further or move to finalize. If you have a conflict, please call me, I'm available all day except 11-12.

Changes are tracked in the attached copy and each has a comment to explain the rationale and help you find the changes. They include:

- Exec Summary (p 6): Corrected the full name of NPDES - National ~~Pollution~~ Pollutant Discharge and Elimination System
- Guiding Principles #1 (p.22): Corrected punctuation and modified tenses to be consistent.
- Sec 1.2.2. Conditions in an NPDES Permit
 - p.28: Rephrased the last sentence in the intro to this section. This change is intended to avoid the suggestion that all components of the recommendation are required for a trade to be enforceable. Oregon's current trading requirements do not line up with all of the recommendations, but they still consider them to be enforceable and are not comfortable implying otherwise.
 - p.30: Replaced "WQBEL compliance point" as a descriptor for a trade compliance point with "TMDL WLA and other points defined in the TMDL." The worry was that the previous term would imply that the trade's compliance point should be the end of the pipe (vs point of max impact, as used by OR temp trading and Lower Boise framework). Suggested language avoids that potential implication.
 - p.40: Clarifying edit
- Sec 2.1 Deriving Trading Baseline: Added definition of grey technology in a footnote here and in the glossary. It was previous undefined.

Best,
Carrie

503.894.8426